



**REPUBLIC OF
THE MARSHALL ISLANDS**
MARITIME ADMINISTRATOR

Marine Guideline

No. 2-13-8

May/2021

TO: ALL SHIPOWNERS, OPERATORS, MASTERS AND OFFICERS OF MERCHANT SHIPS, AND RECOGNIZED ORGANIZATIONS

SUBJECT: Guidance on the Application of MARPOL, ANNEX II to Offshore Support Vessels

- References:**
- (a) **MARPOL Convention**, *International Convention for the Prevention of Pollution from Ships*, Consolidated Edition 2017
 - (b) **IBC Code**, *International Code for the Construction and Equipment of Ships Carrying Dangerous Chemicals in Bulk*, 2020 Edition
 - (c) **IMO Resolution [A.673\(16\)](#)**, *Guidelines for the transport and handling of limited amounts of hazardous and noxious liquid substances in bulk on offshore support vessels*, adopted 19 October 1989 (*superseded by A.1122(30)*)
 - (d) **IMO Resolution [A.1122\(30\)](#)**, *Code for the transport and handling of hazardous and noxious liquid substances in bulk on offshore support vessels (OSV Chemical Code)*, adopted 18 December 2018
 - (e) **IMO Circular [MEPC.2/Circ.26](#)**, *Provisional categorization of liquid substances in accordance with MARPOL ANNEX II and the IBC CODE*, 1 December 2020

PURPOSE

New IBC Code requirements entered into force on 1 January 2021. This Guideline explains how Offshore Support Vessels (OSVs), certified in accordance with IMO Resolution A.673(16), may meet the requirements to transport and handle hazardous and liquid substances in bulk.

APPLICABILITY

This Guideline applies to OSVs constructed before 1 July 2018 that are transporting and handling hazardous cargoes.

BACKGROUND

The IBC Code amendments IMO Resolution [MEPC.318\(74\)](#)¹ entered into force on 1 January 2021. They imposed revised, and in many cases, stricter carriage requirements for products listed in IBC Code Chapter 17 and in [MEPC.2/Circ.26](#). This has created an issue for OSVs:

- (a) with keels laid or were at a similar stage of construction on or after 19 April 1990, and before 1 July 2018; and
- (b) that carry a Certificate of Fitness for the carriage of cargoes listed in Appendix 1 of IMO Resolution [A.673\(16\)](#).

Many products previously assigned a pollution hazard (P) are reassigned to safety hazard (S) and in some cases they are categorized as toxic products. Some product names have also changed.

The result is that these OSVs will not be able to continue carrying many of the products listed in Appendix 1 of A.673(16). They will be permitted to carry only:

- (a) products which for safety reasons may be assigned for carriage on a type 3 ship, as defined in the IBC Code, and which are not required to meet the requirements for toxic products in section 15.12 of that Code;
- (b) noxious liquid substances which would be permitted for carriage on a type 3 ship; and
- (c) flammable liquids.

For an OSV to carry a broader range of the products in IBC Chapter 17 and MEPC.2/Circ.26, it must comply fully with either the IBC Code or the OSV [Chemical Code](#).

The OSV Chemical Code, which superseded IMO Resolution A.673(16), is applicable to OSVs with keels laid or were at a similar stage of construction on or after 1 July 2018. Section 1.1.9 permits the carriage of the following products:

- (a) those listed in chapters 17 or 18 of the IBC Code and the latest edition of the MEPC.2/Circ.26 and their related references to chapters 15 and 19; or
- (b) oil or water-based mud containing mixtures of products listed in chapters 17 and 18 of the IBC Code and the MEPC.2 Circular; or
- (c) liquid carbon dioxide (high purity and reclaimed quality) and liquid nitrogen; or
- (d) contaminated backloads.

However, like the IBC Code, OSVs complying with IMO Resolution [A.673\(16\)](#) may have difficulty in meeting the OSV Chemical Code's higher standards.

1. *2019 Amendments to the International Code for the Construction and Equipment of Ships Carrying Dangerous Chemicals in Bulk.*

The Republic of the Marshall Islands Maritime Administrator (the “Administrator”) is providing a transition period to allow an operator to fully comply with the new requirements or opt for restrictions being placed on the vessel’s Certificate of Fitness for the products that can be carried.

GUIDANCE

1.0 Transitional Period

- 1.1 In accordance with MARPOL Annex II/4.1.1, the Administrator’s transition period until 31 December 2021 permits OSVs that comply with IMO Resolution A.673(16) to continue carrying the full cargo range originally indicated in their Certificate of Fitness. The Administrator placed a notification of this transition period in the IMO GISIS system.
- 1.2 Continued cargo carriage under IMO Resolution A. 673(16) during this transition period, is subject to the OSV:
 - .1 maintaining a valid Certificate of Fitness; and
 - .2 carrying only products listed in Appendix 1 of A.673(16).
 - .3 These OSVs may continue to carry products that they are already certified to carry. No additional products may be added during this time.
- 1.3 During the transition period shipowners and operators of A.673(16)-compliant OSVs are strongly encouraged to:
 - .1 contact the relevant coastal State authority to discuss the requirements for operating in its jurisdiction;
 - .2 consult their Class Society for vessel-specific requirements; and
 - .3 immediately implement the training in IMO Resolution [A.1122\(30\)](#), §15.3.

2.0 Post-Transition

On 1 January 2022, OSVs with keels laid prior to 1 July 2018 must either:

- 2.1 comply fully with OSV Chemical Code Res A.1122(30); or
- 2.2 be restricted to carrying a revised products list under IMO Resolution [A.673\(16\)](#) as indicated in a newly issued Certificate of Fitness.